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dba Hyatt Regency San Francisco Airport, Jimmy  
Flores, Ron Gray, Tom Phipps and Jose Reyes

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

THROY OTANES,

Plaintiff,

v.

HYATT REGENCY HOTEL  
(BURLINGAME), JIMMY FLORES,  
RON GRAY, TOM PHIPPS, JOSE  
REYES, and DOES ONE through FIFTY,

Defendants.

Case No. CV 07 5936 MHP

**DEFENDANTS' RULE 26(F) REPORT/  
PROPOSED DISCOVERY PLAN**

Complaint Filed in State Court: May 15, 2007

The parties submitted and filed a Joint Case Management Conference Statement with the Court on February 29, 2008. Defendants submit this additional Rule 26(f) Report/Discovery Plan in accordance with the Court's Order Setting Case Management Conference dated November 26, 2007, however Defendants also note that the information contained herein is duplicative of (and consistent with) the parties' previously filed Joint Case Management Conference Statement.

**Proposed Discovery Plan:**

1. **Initial Disclosures:** The parties have stipulated that they will exchange Initial Disclosures no later than March 20, 2008.
2. **Subjects of Discovery:** Discovery will be conducted regarding Plaintiff's alleged claims as stated in her complaint. Defendant will be taking Plaintiff's deposition, serving interrogatories, and serving document requests. The parties have set forth the proposed dates for

1 completion of discovery in their Joint Case Management Conference Statement. Defendant does  
2 not believe that the parties' discovery needs to be completed in phases or be limited to or focused  
3 on particular issues.

4 3. Electronic Discovery: Defendant will make available for inspection and copying  
5 hard copies of all non-privileged electronically stored information (e-mails) related to Plaintiff's  
6 termination of employment to the extent any such information exists.

7 4. Privileged Information: Defendant's only claim of privilege will be as to  
8 correspondence and communications with counsel.

9 5. Limitations on Discovery: The parties' proposed limitations on discovery are  
10 listed at page 5 of the Joint Case Management Conference Statement filed on February 29, 2008.

11 6. Other Items:

12 The parties have agreed to participate in the Court's Early Neutral Evaluation  
13 program and will conduct Early Neutral Evaluation within the next 90 days.

14  
15 Dated: March 3, 2008

16 /s/ Lisa M. van Krieken  
17 Lisa M. van Krieken  
18 Attorneys for Defendant  
19 Hyatt Corporation  
20 d/b/a Hyatt Regency San Francisco Airport,  
21 Jimmy Flores, Ron Gray, Tom Phipps and Jose Reyes

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